

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**JOINT MOTION TO EXTEND THE DEADLINES FOR
EXPERT DISCOVERY AND MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs and Defendant Dexia Bank Belgium (“Dexia”) file this joint motion to extend briefly the deadlines for expert discovery and motions for summary judgment. In support of this motion, the parties state as follows:

1. On December 7, 2006, the Court granted the parties’ joint motion to extend the deadlines for expert discovery and motions for summary judgment, and established the following schedule for expert discovery and motions for summary judgment:

December 20, 2006: Deadline for Expert Reports Concerning any Matters for which any Party Bears the Burden of Proof.

January 29, 2007: Deadline for Rebuttal Expert Reports

March 7, 2007: Deadline for Completion of Expert Depositions

April 4, 2007: Deadline for any Motion for Summary Judgment¹

2. The Parties have been working diligently with each of their respective experts to finalize the reports by the previously set deadline. The intervening holidays and coordination of experts’ schedules around these holidays compels the Parties to seek a short two week extension to finalize the reports.

3. As a result of this requested extension for the deadline for expert reports, the parties submit the deadlines for expert depositions and motions for summary judgment likewise should be extended. Under the proposed schedule these cases will remain on track for a pre-trial conference by mid-2007.

¹ The Parties previously agreed to a short two-day extension by which to exchange expert reports, but now seek an extension of the full schedule by two weeks plus these two days.

WHEREFORE, the parties jointly request that this Court extend the deadlines for expert discovery and motions for summary judgment as follows:

January 5, 2007: Deadline for Expert Reports Concerning any Matters for which any Party Bears the Burden of Proof.

February 16, 2007: Deadline for Rebuttal Expert Reports

March 23, 2007: Deadline for Completion of Expert Depositions

April 20, 2007: Deadline for any Motion for Summary Judgment

Dated: December 19, 2006

Respectfully submitted,

**BERMAN DEVALERIO PEASE
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